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SURGICAL INSTRUMENT SERVICE COMPANY, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SURGICAL INSTRUMENT SERVICE
COMPANY, INC.

Plaintiff/Counter-Defendant,

v.

INTUITIVE SURGICAL, INC.,

Defendant/Counterclaimant.

Case No. 3:21-cv-03496-AMO
Honorable Araceli Martínez-Olguín

**OMNIBUS MOTION TO SEAL AND
[PROPOSED] ORDER REGARDING
SEALING OF SIS's EVIDENTIARY
PROFFER REGARDING INTUITIVE'S
MOTION IN LIMINE #1**

Pursuant to Civil Local Rules 7-11 and 79-5, and the Joint Stipulation and Order Regarding Omnibus Sealing Procedures, Dkt. 242, Plaintiff Surgical Instrument Service Company, Inc. (“SIS”) hereby files this Omnibus Sealing Motion to seal certain materials.

On December 12, 2024, SIS filed its Evidentiary Proffer Regarding Intuitive’s Motion in Limine No. 1, Dkt. 332. Pursuant to the Joint Stipulation and Order Regarding Omnibus Sealing Procedures, Dkt. 242, SIS filed portions of its Evidentiary Proffer Regarding Intuitive’s Motion in Limine No. 1 and certain exhibits thereto under seal via an interim sealing motion, Dkt. 331, because the proffer and the exhibits included materials that had been marked “Confidential” or “Confidential – Attorneys’ Eyes Only” by Intuitive Surgical, Inc. (“Intuitive”).

SIS has conferred with Intuitive regarding Intuitive’s materials that were discussed in the proffer and/or attached as exhibits thereto. Intuitive has indicated that it wishes to maintain Exhibit 2 to the Van Hoven Declaration (Dkt. 331-2 – Intuitive-00439333- Intuitive-00439355) under seal. A declaration in support of this request is attached under seal hereto as Exhibit A while the Exhibit is attached under seal as Exhibit B. Should the request be granted, proposed redactions of the proffer are attached under seal as Exhibit C.

Dated: January 2, 2025

By: /s/ Joshua Van Hoven
Joshua V. Van Hoven

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